UNITED STATES DISTRICT	COURT
DISTRICT OF DELAWARE	

	<del></del>
INEOS FLUOR AMERICAS LLC,	)
Plaintiff,	)
v.	) C.A. No. 06-189 (SLR)
HONEYWELL INTERNATIONAL INC.,	) )
Defendant.	) PUBLIC VERSION
	)

# AFFIDAVIT OF CHARLES GRAF IN SUPPORT OF HONEYWELL'S OPPOSITION TO INEOS'S MOTION TO COMPEL PRODUCTION OF DOCUMENTS

Charles Graf, having first been duly sworn, deposes and says:

- 1. I am Chief Litigation Counsel for the Specialty Materials business of Honeywell International Inc. ("Honeywell")
- 2. I submit this declaration in support of Honeywell's Opposition To Ineos's Motion To Compel Production Of Documents.
- 3. Honeywell has a large and active legal department, and its businesspeople regularly consult with its attorneys.
- 4. The following individuals serve or have served as inside or outside counsel to Honeywell: Elizabeth ("Beth") Stairs, Katherine Ma, Steve Plotkin, Jeffrey Neuman, Charles ("Chuck") Graf, and Linda Clark.

5.

### REDACTED

6.

## REDACTED

7.

Executed this 29<sup>12</sup> day of May 2007:

Sworn to before me this day of May 2007

TAMMY J. VICINO Notary Public, State of New Jersey
My Commission Expires
JULY 8, 2007

#### **CERTIFICATE OF SERVICE**

I, Jason A. Cincilla, Esquire, hereby certify that copies of the <u>Public</u>

<u>Version</u> of Affidavit Of Charles Graf In Support Of Honeywell's Opposition To

Ineos's Motion To Compel Production Of Documents were served on June 8, 2007 as
follows:

#### **BY ELECTRONIC FILING:**

C. Barr Flinn, Esq. Karen L. Pascale, Esq. Young Conaway Stargatt & Taylor, LLP The Brandywine Building 1000 West Street, 17<sup>th</sup> Floor P. O. Box 391 Wilmington, DE 19899-0391

#### **BY ELECTRONIC MAIL:**

Richard S. Order, Esq. Axinn, Veltrop & Harkrider LLP 90 State House Square, 11th Floor Hartford, Connecticut 06103 rso@avhlaw.com

/s/ Jason A. Cincilla
Jason A. Cincilla (#4232)